



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

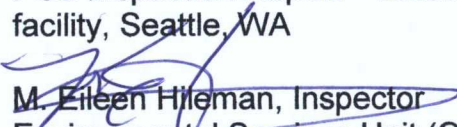
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

May 15, 2009

Reply to
Attn Of: OEA -095

MEMORANDUM

SUBJECT: PCB Inspection Report – Emerald Services, E. Marginal Way
facility, Seattle, WA

FROM:  M. Eileen Hileman, Inspector
Environmental Services Unit (OEA-095)
Office of Environmental Assessment

THRU: Scott Downey, Manager
Pesticides and Toxics Unit (OCE – 084)
Office of Compliance and Enforcement

TO: Daniel Duncan, PCB Coordinator
Pesticides and Toxics Unit

Attached is the above referenced inspection report and all attachments. The TSCA PCB ICDS Form for the inspection has been sent to Laurie Kral. If anyone has any questions regarding this inspection report, I may be reached at (360) 297-6611.

USEPA REG



0001001



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**EMERALD SERVICES
SEATTLE, WASHINGTON
TSCA /PCB INSPECTION**

FACILITY: Emerald Services
7343 E. Marginal Way S.
Seattle, Washington 98108

MAILING ADDRESS same as above

CONTACTS: Allan Swensson, Field Chemist
Ph: (206) 832-3265
Fax: (206) 832-3030
Email: aswensson@emeraldnw.com

Gary Coil, Operations Controller
Ph: (206) 832-3034
Fax: (206) 832-3134
Email: garyc@emeraldnw.com

Dan Knopp, Warehouse Manager
Ph: (206) 832-3034
Fax: (206) 832-3307
Email: dknopp@emeraldnw.com

J. Stephan Banchero, President & CEO
Ph: (206) 832-3001
Fax: (206) 832-3101
Email: steveb@emeraldnw.com

INSPECTION DATE: May 14, 2009
Entry: 10:00 a.m.
Exit: 13:15 p.m.

REPORT DATE: May 14, 2009

SIC CODE: 4226

LAT/LONG: N 47.54330
W 122.30764

INSPECTOR: Eileen Hileman
Environmental Services Unit
Office of Environmental Assessment
EPA Region 10

BACKGROUND

Emerald Services operates a number of facilities in the state of Washington and in the Pacific Northwest. Emerald Services purchased EnviroTech several years ago and as a result of that purchase expanded their customer base and type of operations to include transport of hazardous materials including PCBs. The inspection request from the PCB Program was to conduct a TSCA PCB inspection of this specific facility because it was listed in the PCB database as a "transporter of PCBs." It should be noted that Emerald also operates an Oil Recycling facility on Airport Way in Seattle, Washington and another transporter facility in Tacoma, Washington – neither of those facilities was visited as part of this inspection. In addition, Emerald also has facilities in Alaska.

ENTRY/INTRODUCTION

On Thursday, May 14, 2009, I arrived at the facility at 10:00 a.m., signed in at the receptionist desk, presented my credentials and business card to the receptionist and requested that she notify appropriate staff that I was at the site to conduct a PCB inspection. The receptionist asked what Department she should contact and I suggested the Environmental Department. The receptionist notified me a short time later that the Environmental Coordinator, Sheila Smith, was out of the office but that someone would be with me shortly.

At 10:15 a.m. Gary Coil, Operations Controller, introduced himself and escorted me back to his office. I presented my credentials to Mr. Coil and explained the nature of the inspection I planned to conduct. I presented the TSCA Notices to Mr. Coil and he read and signed the Notices. The Notices are appended to this inspection report as Attachment I.

Mr. Coil consulted with Sheila Smith, Environmental Coordinator, by phone periodically during my inspection and at one point during the inspection, turned the phone over to me to allow Ms. Smith to converse with me directly. After conversations with Mr. Coil and Ms. Smith, it became clear to all of us, that those most knowledgeable regarding the handling of PCBs at this facility were located not in the environmental office but in the warehouse, the Customer Care Department and with the Chemists who work with the drivers. Mr. Coil and Ms. Smith contacted those individuals and they joined us in Mr. Coil's office.

I then presented credentials to Mr. Dan Knopp, Warehouse Manager and Mr. Allan Swensson, Field Chemist and explained the nature of my inspection. We were temporarily joined by Steve Banchemero, President & CEO of Emerald Services and I again presented my credentials and explained the nature of my inspection to Mr. Banchemero. Once Mr. Banchemero was satisfied that I had connected with the right people on his staff, he returned to his office and I resumed the inspection.

PRE-INSPECTION CONFERENCE & RECORDS REVIEW

According to Mr. Coil, Mr. Knopp & Mr. Swensson, the facility mainly handles PCB light ballasts. The majority of the generators of these ballasts utilizes the assumption requirement and treats the ballasts as containing 50 ppm or greater PCBs. Mr. Knopp stated that he has been the warehouse manager at this facility for two and one-half years and during that period time he has only seen drums of ballasts come through the facility. Mr. Knopp stated that he has never in his 2.5 years seen PCB or PCB-contaminated oil or transformers or capacitors or any other form of electrical equipment transported to this facility – only light ballasts.

Mr. Coil and Mr. Knopp pointed out that all items transported to the warehouse are stored 10 or fewer days at the facility. The warehouse is mainly used as a staging area where items are sorted by where they will be transported for disposal then reloaded and shipped. According to all present this all occurs within ten days time. Mr. Knopp specifically stated that no item is ever stored beyond ten days.

I asked Ms. Smith over the phone about exception reports – apparently, while exception reports have been filed regarding the Emerald Oil Recycling Facility on Airport Way in Seattle, there have not been any exception reports filed by this transport facility.

Mr. Coil provided me with copies of Emerald's EMS document entitled "3.8.1 Regulated Waste Confirmation and Profiling – Tacoma Facility". That document is appended to this inspection report as Attachment II. According to Mr. Coil, this document also applies to the Marginal Way facility as well and noted that the document needed to be updated to reflect that. I reviewed the document and pointed out that the document was specific with regard to RCRA but not TSCA waste. Mr. Coil and Ms. Smith pointed out that the document was a work in progress and that it would be updated to include TSCA PCB specific information.

Mr. Swensson stated that he worked very closely with the transport drivers of both the Marginal Way facility and the Tacoma facility and provided me with waste profile documents specific to PCB waste that were utilized by Emerald Services. Appended to this inspection report as Attachment III are: 1) Emerald Services Internal Document utilized by Emerald Drivers when picking up PCB waste; 2) a Waste Management generator's profile sheet; and U.S. Ecology generator PCB waste product questionnaire. According to Mr. Swensson, he oversees all profiles generated by Emerald customers and reviews the profiles prior to pickup. Mr. Swensson also stated that the drivers for the Emerald Marginal Way facility who transport this waste have 15-20 years experience in the transport of hazardous materials and are very familiar with the PCB regulations.

According to Ms. Smith, no Annual Reports are prepared for this facility as the facility has only handled light ballasts, no spills have occurred and the storage is only temporary (less than 10 days).

FIELD INSPECTION

Accompanied by Mr. Coil & Mr. Knopp, I walked to the area where PCBs would be temporarily (10 days or less) stored prior to shipment to a disposal facility. This area identified by Mr. Knopp & Mr. Coil is inside the warehouse. There were no PCB drums, articles or items in the warehouse at the time of my inspection. According to Mr. Knopp nothing is ever stored outside the warehouse and I did not observe anything outside the warehouse. Mr. Knopp pointed out the spill containment kit that was adjacent to the area (see photographs).

OUT BRIEFING

I thanked Mr. Knopp and Mr. Swansson for their time and then I followed Mr. Coil to a conference room. I explained that my report would be submitted to the TSCA PCB Program the following week and that the Program would make a determination of compliance or non-compliance and contact the facility and that usually contact occurs within six months of the inspection. I provided Mr. Coil with the name and phone numbers of PCB programs staff for future reference. I completed a Receipt for Documents which Mr. Coil signed, I then thanked Mr. Coil for his assistance and I left the facility at 13:15 p.m The Receipt for Documents is included in Attachment I.

ATTACHMENTS

1. Notice of Inspection, TSCA Confidentiality Notice
2. EMS Document & Table of Contents
3. Waste Profile Supporting Documentation
4. Photography Log
5. Photo Disk

May 15, 09
DATE REPORT SUBMITTED

M. E. H. H.
SIGNATURE OF INVESTIGATOR

H



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE 5-14-09	INSPECTION NO. F12384	DAILY SEQ. NO. 001	Emerald Svcs
2. INSPECTOR'S ADDRESS EPA RID 1200 6th Ave Seattle, WA 98101			4. FACILITY ADDRESS 7343 E. Marginal Way S Seattle WA 98108

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE <i>M. Eileen Hileman</i>		RECIPIENT'S SIGNATURE <i>Garry Coit</i>	
NAME M. Eileen Hileman		NAME Garry Coit	
TITLE Inspector	DATE SIGNED 5-14-09	TITLE Operations Controller	DATE SIGNED 5/14/09

EPA FORM 7740-3 (REVISED JULY 1997) CORE TSCA --- PREVIOUS VERSIONS ARE OBSOLETE

INSPECTOR'S COPY



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

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☐ In addition, this inspection extends to (check appropriate blocks):

- | | |
|--|--|
| <input type="checkbox"/> A. Financial data | <input type="checkbox"/> D. Personnel data |
| <input type="checkbox"/> B. Sales data | <input type="checkbox"/> E. Research data |
| <input type="checkbox"/> C. Pricing data | |

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NAME M. Eileen Hileman		NAME Garry Coit	
TITLE Inspector	DATE SIGNED 5-14-09	TITLE Operations Controller	DATE SIGNED 5/14/09



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WASHINGTON, DC 20460
TOXIC SUBSTANCES CONTROL ACT
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2. INSPECTOR'S NAME M. Eileen Hileman			5. ADDRESS 7343 E. Marginal Way S, Seattle WA 98108
3. INSPECTOR'S ADDRESS EPA RID 1200 6th Ave. Seattle, WA 98101			6. NAME OF CHIEF EXECUTIVE OFFICER Regulatory Affairs Mgr Sheila Smith
			7. TITLE Regulatory Affairs Mgr.

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TO ASSERT A TSCA CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during the inspection of the facility cited above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR, Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the EPA Administrator determines that the data is entitled to confidential treatment, or may be withheld from release under other exceptions of FOIA.

Any or all information collected by EPA during the inspection may be claimed as confidential if it relates to trade secrets, commercial, or financial matters that you consider to be confidential business information (CBI). If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of CBI. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information claimed as CBI.

A CBI claim may be asserted at any time prior to, during, or after the information is collected. This notice was developed by EPA to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationary or by making the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this notice. The inspector will be glad to answer any questions you may have regarding EPA's CBI procedures.

While you may claim any collected information or sample as CBI, such claims are not likely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies), or by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is CBI.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your company within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive CBI treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this notice. Claims may be made at any time after the inspection, but the inspection data will not be entered into the TSCA/CBI security system until an official confidentiality claim is made. The data will be handled under EPA's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE
I acknowledge receipt of this notice:

If there is no one on the premise who is authorized to make CBI claims for this facility, a copy of this notice and other inspection materials will be sent to the company's Chief Executive Officer. If there is another official who should also receive this information, please designate below.

SIGNATURE Gary Coil		NAME	
NAME Gary Coil		TITLE	
TITLE Operations Controller	DATE SIGNED 5/14/09	ADDRESS	



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SIGNATURE X Gary Coil	NAME
NAME X Gary Coil	TITLE
TITLE X Operations Controller	DATE SIGNED X 5/14/09
ADDRESS	



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME
DATE 5-14-09	INSPECTION NO. F12384	DAILY SEQ. NO. 001	Emerald SVCS
3. INSPECTOR ADDRESS EPA RID 1200 6th Ave. Seattle, WA 98101			4. COMPANY ADDRESS 7343 E Marginal Way S. Seattle, WA 98108

For internal EPA use. Copies of this form may be provided to recipient as acknowledgment of the documents and samples of chemical substances and/or mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
1.	U.S. Ecology PCB Control Sheet
2.	American Ecology Generator PCB waste Product Quest.
3.	WM Generators HAZ. Waste Profile Pkg (Example) 4 pgs
4.	Emerald work Order Pick-up (Pkg) 4 pgs
5.	EMS Guideline 3.8.1
6.	EMS Table of Contents

Nicholas Fallano 5-14-09

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐

NOT REQUESTED ☐

No Samples

INSPECTOR SIGNATURE

CLAIMANT SIGNATURE

NAME

NAME

TITLE

DATE SIGNED

TITLE

DATE SIGNED



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TOXIC SUBSTANCES CONTROL ACT

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No Samples

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NAME

TITLE

CLAIMANT SIGNATURE

NAME

TITLE

DATE SIGNED

FF

3.8.1 REGULATED WASTE CONFIRMATION AND PROFILING – TACOMA FACILITY

- 1.0 Subject:** Requirements for confirmation and profiling of waste for management at the Emerald-Tacoma facility
- 2.0 Group(s) Affected:** Sales and Field Service Representatives
Tacoma Facility Laboratory and Profile Approval Personnel
- 3.0 Effective Date:** 12/05/02
- 3.1 Revision Date:** 10/1/07
- 4.0 Policy**

Waste streams intended for disposal at the Emerald-Tacoma facility must be sampled, confirmed, and profiled in accordance with requirements of the facility Part B Permit and Waste Analysis Plan. All waste streams, with the exception of unused formulations, universal waste, antifreeze, parts washer solvent waste streams (Emerald parts washer solvent), and waste streams from conditionally exempt small quantity generators must be confirmed by the Emerald-Tacoma laboratory prior to approval for shipment. Typically, waste streams must have a minimum Btu of 5,000, with lower Btu waste streams accepted on a case-by-case basis. All other process limitations in the Tacoma facility Part B Permit and Waste Analysis Plan must also be met.

4.1 Generator Information

1. Upon initial contact by the generator, determine if a site visit is necessary by reviewing the Site Audit Checklist. If the generator does not have a good understanding of the dangerous waste regulations or generates waste streams that Emerald cannot accept, then coordinate a site audit visit with the generator.
2. If the generator's waste stream does not meet Emerald's process limitations, it will need to be managed through transfer facility operations or a direct shipment to a disposal facility.
3. The following categories of waste streams must be managed as transfer or direct-ship:
 - Biological;
 - Pesticide, herbicide, insecticide;
 - Infectious;
 - Explosive;
 - Reactive;
 - Corrosive;
 - Radioactive; or,
 - Oxidizer.

4. If the generator's waste stream appears to meet Emerald's acceptance requirements, use the site audit checklist to document information from the generator regarding the waste stream. This may include any of the following:
 - An MSDS, HMIS Stock Number, and/or formulation on the label for unused products or products used in the process;
 - Process generating the waste stream;
 - Type of business/industry;
 - Results of any analysis performed on the waste stream; and,
 - Documented studies explaining the process and constituents used.
5. If the waste stream is an unused formulation, prepare a profile based on the information obtained from the generator.
6. If the waste stream is not an unused formulation, and the generator is not conditionally exempt, collect a representative sample of the waste stream and fill out a profile to the extent possible. If the information provided by the generator is not adequate to complete a profile, pull additional sample(s) for characterization analysis.
7. Submit the draft profile, the Site Audit Checklist, a sample (if required) and any other information gathered from the generator to the Tacoma facility for approval.

4.2 Site Visits

1. Sampling may be required at the generator site. Ensure you have sampling equipment, labels, chains-of-custody forms, a cooler, and appropriate PPE.
2. If you suspect the generator may need characterization analysis, determine the analysis which may be required. See Table 2 for recommended analyses for typical waste streams, or contact the Environmental Coordinator for guidance. If characterization analysis is expected, contact the proposed laboratory to pick up the required sample containers and chains-of-custody before you arrive at the generator site.
4. Upon arrival, do a walk-through of the generator site and record the results of the walk-through and any sampling on the Site Audit Checklist.

4.3 Sampling Requirements and Profile Submittal

1. If the site visit indicates that the generator waste stream matches the specifications of a multiple-use profile, record the multiple-use profile number on Site Audit Checklist.
2. If the generator waste stream does not match the specifications of a multiple-use profile, and the generator has sufficient information to complete a new profile, collect one 4-oz representative sample for confirmation testing at the Tacoma laboratory

(collect at least 8 oz, or 2 samples for Emerald if the waste stream has a water layer). (Profiles for unused products and CESQG waste streams do not require samples.)

3. If the generator waste stream must be characterized by an accredited laboratory, collect one 4-oz representative sample for confirmation testing at the Tacoma laboratory (collect 2 samples for Emerald if the waste stream has a water layer), plus the samples required by the accredited laboratory for characterization analysis.
4. Preserve the sample(s) as required by the receiving laboratory (see also Sample Management). Emerald samples must be preserved on ice.
5. Submit the samples to the respective laboratories as required. Confirmation samples must be accompanied by a profile or must be marked "Hold pending characterization."
6. For samples sent for characterization analysis, once characterization analysis is received, prepare a draft profile or select a multiple-use profile, then submit the profile along with any supporting documentation to the Tacoma laboratory.
7. If the sample passes confirmation testing, you will receive approval for shipment to the Emerald Tacoma facility.

Table 1

Process Limitations			
Waste Analysis and Acceptance Parameters	Solvent Recycling	Fuel Blending	Glycol Recycling
Compatibility Screen	Compatible	Compatible	Compatible
Sulfide Screen	<500ppm	<500ppm	<500ppm
Cyanide Screen	<250ppm	<250ppm	<250ppm
Flash Point	N/A	N/A	>140°F
Heat of Combustion (BTU)	N/A	>5,000 BTU/lb	N/A
Ignitability Screen	N/A	Positive	Negative
PCBs**	< 2ppm	<2ppm	<2ppm
pH	2 > pH <12.5	2 > pH <12.5	2 > pH <12.5
Specific Gravity	0.5-1.6	0.5-1.6	0.5-1.6
Physical description - state	Semisolid - slurry/liquid	Liquid/semi-solid/sludge/solid	Liquid
Radiation Screen	Less than background	Less than background	Less than background
VOC Level 1 Calculation	< 11.1psia	< 11.1psia	< 11.1psia
Water Reactivity Screen	Non-reactive	Non-reactive	Non-reactive
Waste Codes	D001, F001-F005, D004-D011, D018-D043, K086, K087, K169, K170, U002, U004, U019, U031, U037, U051, U052, U056, U057, U080, U140, U159, U161, U165, U210, U220, U227, U228, U239, WT01, WT02, WP01, WP02, WP03	D001, F001-F005, D004-D011, D018-D043, K086, K087, K169, K170, U002, U004, U019, U031, U037*, U051, U052, U056, U057, U080*, U140, U159, U161, U165, U210*, U220, U227*, U228*, U239, W001***, WT01, WT02, WP01, WP02, WP03	D008, D018, WT01, WT02
Water Content**	N/A	<60%	<90%
Solvent Concentration**	Varies by product	N/A	N/A

*U-listed waste streams may be fuel blended if spilled into a waste which has Btu >5000.

**Analyzed for internal purposes only.

*** W001 wastes managed separately on a case-by-case basis.

Table 2

Recommended Methods for Typical Wastes		
Typical Hazardous Waste Types	Waste Category	Recommended Analytical Method(s)
Brake Fluid	Criteria Wastes (Toxic)	SW-846 1311 SW-846 3000 series SW-846 6010B SW-846 8260B "Book" designation Static acute fish toxicity Acute oral rat toxicity
Chlorinated Solvents	Listed Wastes	SW-846 3000 series SW-846 5000 series SW-846 8260B and 8270C
Cold Tank Carburetor Cleaner	Listed Wastes	SW-846 3000 series SW-846 5000 series SW-846 8260B and 8270C
Carburetor Cleaner (w/NMP)	Toxicity Characteristic (TCLP)	SW-846 1311 SW-846 3000 series SW-846 5000 series SW-846 6010B or 6020 SW-846 7470A or 7471A SW-846 8260B and 8270C
Contaminated ATF	Listed Wastes	SW-846 3000 series SW-846 5000 series SW-846 8260B and 8270C
Contaminated Oil	Listed Wastes	Chlor-d-tect
Conversion Coatings	Characteristic Wastes (Corrosive)	SW-846 9045C
Grinding Coolant Sludge	Toxicity Characteristic (TCLP)	SW-846 1311 SW-846 3000 series SW-846 5000 series SW-846 6010B or 6020 SW-846 7470A or 7471A SW-846 8260B and 8270C
Masking Tape & Overspray Paper	Toxicity Characteristic (TCLP)	SW-846 1311 SW-846 3000 series SW-846 5000 series SW-846 6010B or 6020 SW-846 7470A or 7471A SW-846 8260B and 8270C
Methylene Chloride from Aluminum Parts Cleaning	Criteria Wastes (Persistent)	SW-846 3000 series SW-846 5000 series SW-846 8310 SW-846 8260B and 8270C

Recommended Methods for Typical Wastes		
Typical Hazardous Waste Types	Waste Category	Recommended Analytical Method(s)
Methylene Chloride Solvent	Criteria Wastes (Persistent)	SW-846 3000 series SW-846 5000 series SW-846 8310 SW-846 8260B and 8270C
Other Chlorinated Solvents	Listed Wastes	SW-846 3000 series SW-846 5000 series SW-846 8260B and 8270C
Other Solvents with the work "-chlor-" as part of the main ingredients	Criteria Wastes (Persistent)	SW-846 3000 series SW-846 5000 series SW-846 8310 SW-846 8260B and 8270C
Paint Booth Filters	Toxicity Characteristic (TCLP)	SW-846 1311 SW-846 3000 series SW-846 5000 series SW-846 6010B or 6020 SW-846 7470A or 7471A SW-846 8260B and 8270C
Paint Wastes	Toxicity Characteristic (TCLP)	SW-846 1311 SW-846 3000 series SW-846 5000 series SW-846 6010B or 6020 SW-846 7470A or 7471A SW-846 8260B and 8270C
Rust Inhibitor	Criteria Wastes (Toxic)	SW-846 1311 SW-846 3000 series SW-846 6010B SW-846 8260B "Book" designation Static acute fish toxicity Acute oral rat toxicity
Spent Coolants Containing Chlorinated Compounds	Criteria Wastes (Persistent)	SW-846 3000 series SW-846 5000 series SW-846 8310 SW-846 8260B and 8270C
Spent Hot Tank Solution & Sludge	Corrosive Toxicity Characteristic (TCLP)	SW-846 9045C SW-846 1311 SW-846 3000 series SW-846 5000 series SW-846 6010B or 6020 SW-846 7470A or 7471A SW-846 8260B and 8270C
Spent Solvents	Ignitable	SW-846 1010 or 1020A
Spent Thinners and Solvents	Ignitable	SW-846 1010 or 1020A
Spent Valve Tumbler Solvent	Ignitable	SW-846 1010 or 1020A

Recommended Methods for Typical Wastes		
Typical Hazardous Waste Types	Waste Category	Recommended Analytical Method(s)
Waste Antifreeze	Criteria Wastes (Toxic)	SW-846 1311 SW-846 3000 series SW-846 6010B SW-846 8260B "Book" designation Static acute fish toxicity Acute oral rat toxicity



Office Info

IT

Safety

EMS

Human Resources

Traffic and Weather

E-Mail

Welcome to the Emerald Services Corporate Intranet

Click [here](#) to reach the IT Dept

EMS Table of Contents

(March 2009 Update)

[1.0 Environmental Policy](#)

[2.0 Planning](#)

[3.0 Implementation and Policy](#)

[3.1 Structures and Responsibilities](#)

[3.2 Training](#)

[3.3 Communication](#)

[3.4 Documentation](#)

[3.5 Document Control](#)

[3.6 Environmental Policies](#)

- [3.6.1 Vehicle and Equipment Maintenance and Operations](#)
- [3.6.2 Facility Cleanliness Policy](#)
- [3.6.3 Container Management Policy](#)
- [3.6.4 Manifests, Bills of Lading, Placarding, and Profiling](#)
- [3.6.5 PCB Management Policy](#)
- [3.6.6 Used Oil Management Policy](#)
- [3.6.7 Hazardous Waste Disposal Facilities and Used Oil Burners Policy](#)
- [3.6.7 Attachment 1 Approved Facility List](#)
- [3.6.8 Laboratory Management of PCBs](#)
- [3.6.9 DOT Shipping Exemption Policy](#)
- [3.6.10 Facility Security](#)
- [3.6.11 EMS Inspection Program](#)
- [3.6.12 Transfer Facility Operations](#)
- [3.6.12 Attachment 3 - Webster Weekly Transfer Facility Inspection](#)
- [3.6.13 General Facility Safety & Emergency Equipment Inspection](#)
- [3.6.13 Attachment 1 - General Facility Inspection Log](#)
- [3.6.14 Empty Container Management](#)
- [3.6.15 Compliance with Chemical Diversion and Trafficking Act](#)
- [3.6.16 Tank And Facility Labeling Requirements.pdf](#)
- [3.6.17 Management of Investigation Derived Waste Requiring Immediate Removal From Generator Site](#)
- [3.6.18 Procedure for Handling Oil Filters](#)
- [3.6.19 Notification Requirements for Changes in Facility Operations](#)
- [3.6.19 Attachment 1 Notification Form](#)
- [3.6.20 Managing Regulatory Inspections](#)
- [3.6.21 Railcar Loading and Off-Loading Policy](#)
- [3.6.21 Attachment 1 - General Purpose Tank Car Loading Report](#)
- [3.6.21 Attachment 2 - Railcar Weight Calculation Worksheet](#)

[3.7 Health and Safety policies](#)

- [3.7.1 Personal Protective Equipment Policy](#)
- [3.7.2 Training Requirements for Emerald Personnel](#)
- [3.7.2 Attachment 1 - The Least You Need to Know for Package, Vacuum, and Bulk Drivers](#)
- [3.7.2 Attachment 2 - The Least You Need to Know for Onsite Services](#)
- [3.7.3 Occupational Injuries and Illnesses](#)
- [3.7.4 Contingency Plan and Spill Reporting - Washington](#)
- [3.7.5 Contingency Plan and Spill Reporting - Alaska](#)
- [3.7.6 Contingency Plan And Spill Reporting - Utah](#)
- [3.7.7 Vehicle Accidents and Reporting](#)
- [3.7.8 Medical Monitoring](#)
- [3.7.9 Contingency Plan and Spill Reporting - Montana](#)

- [3.7.10 Contingency Plan and Spill Reporting Policy for Idaho Operations and Facilities](#)

3.8 Field Procedures

- [3.8.1 Regulated Waste Confirmation and Profile Preparation](#)
- [3.8.1 Generator Site Audit Checklist](#)
- [3.8.2 Utilizing Generic Profiles at Airport Way and Vancouver Facilities](#)
- [3.8.2 Attachment 1 - Non-Regulated Profiles List](#)
- [3.8.2 Attachment 2 - Ecology Used Oil Guidance](#)
- [3.8.2 Attachment 3 - Waste Acceptance Form](#)
- [3.8.3 On-Site Verification and Shipment Preparation Requirements](#)
- [3.8.4 Sample Managements at Emerald Laboratories](#)
- [3.8.5 Parts Washer Service Program](#)
- [3.8.6 Loading Bulk product](#)
- [3.8.8 Use of the Tacoma Facility for Transfer Operations](#)
- [3.8.9 Sampling of Bulk and Non-Bulk Containers](#)

3.9 Facility Operations, Airport Way

- [3.9.1 Container Receipt](#)
- [3.9.2 Acceptance of Bulk Loads](#)
- [3.9.3 Off-Loading and Transferring Bulk Materials](#)
- [3.9.4 Used Oil Processing and Tank Management](#)
- [3.9.5 Sludge Solids Verification & Solidification Procedures](#)
- [3.9.6 Gasoline Acceptance and Handling](#)
- [3.9.7 Managing Small Quantity Generator Waste](#)
- [3.9.10 Batch Treatment Processing Procedures](#)
- [3.9.10 Attachment 1 - Batchwater Treatment Operating Checklist](#)
- [3.9.11 Discharge Permit Compliance](#)
- [3.9.12 Wastewater Treatment System Maintenance](#)
- [3.9.14 Requirements for Emerald Generated Dangerous Waste](#)
- [3.9.15 Operating Natural Gas Fired Boilers](#)
- [3.9.15 Attachment 1 - Boiler Water Analysis Instructions](#)
- [3.9.15 Attachment 2 Boiler Daily Log](#)
- [3.9.16 Nightly Closing Inspection](#)
- [3.9.16 Attachment 1 - Nightly Closing Inspection Che...](#)
- [3.9.17 Recordkeeping Procedures for Waste Management Operations](#)
- [3.9.18 U.S. Customs and Border Protection Compliance Agreement](#)
- [3.9.19 Entering and Exiting the APW Facility](#)
- [3.9.20 Preparation of Certificates of Disposal](#)
- [3.9.21 Managing Airport Way Drum Jail](#)
- [3.9.22 Latex Water and Machine Coolant Treatment](#)
- [3.9.23 Dust Control in the Solidification Area](#)
- [3.9.24 Primary Wastewater Treatment System Start-up](#)
- [3.9.25 Wastewater Treatment System Start-up \(DAF-100\)](#)
- [3.9.26 Shutdown of Wastewater Treatment System](#)
- [3.9.27 Routine Clearing of APW Facility Drum Inventory](#)
- [3.9.28 Equipment Maintenance Program.pdf](#)
- [3.9.28 Attachments.pdf](#)
- [3.9.29 Odor Complaint Procedure](#)

3.10 Facility Operations, Anchorage

- [3.10.1 Acceptance of Bulk Loads](#)
- [3.10.2 Off-Loading and Transferring Bulk Product](#)
- [3.10.3 Wastewater Processing](#)
- [3.10.4 Sampling and Analysis for Discharge Approval](#)
- [3.10.5 Universal Waste Management](#)
- [3.10.6 Sludge Solidification](#)
- [3.10.7 Cooking Grease Management](#)
- [3.10.8 Absorbent Material Receiving](#)
- [3.10.9 Oil Filter Receiving](#)
- [3.10.10 Antifreeze Management](#)
- [3.10.11 Recordkeeping for Waste Management Operations](#)
- [3.10.12 Used Oil Processing](#)
- [3.10.13 Empty Drum Management](#)
- [3.10.14 Requirements for Emerald-Generated Waste](#)
- [3.10.15 Tank Cleaning Procedure for Product Tanks](#)
- [3.10.16 Waste Check-In Procedure](#)

3.11: Facility Operations, Spokane

- [3.11.1 Spokane Sludge Solidification and Disposal](#)
- [3.11.2 Policy for Off-Loading and Transferring Bulk Product](#)
- [3.11.3 Requirements for Emerald-Generated Waste](#)
- [3.11.4 Policy for Off-Loading Bulk Product to Transport Hauler](#)

3.12 Facility Operations, Vancouver

- [3.12.1 Used Oil Processing and Management of Used Oil Receiving Tanks](#)
- [3.12.2 Stormwater Processing](#)
- [3.12.3 Subpart B \(Oily\) Wastewater Processing and Discharge](#)
- [3.12.4 Equipment Maintenance Program](#)
- [3.12.5 Transferring from Bulk Trucks to Totes or Totes to Bulk Trucks](#)
- [3.12.7 Recordkeeping Procedures for Waste Management Operations](#)
- [3.12.8 Railcar Loading and Off-Loading](#)
- [3.12.9 Loading, Off-Loading, and-or Transferring Bulk Product](#)
- [3.12.10 Acceptance of Bulk Loads](#)
- [3.12.11 Requirements for Emerald-Generated Dangerous Waste](#)
- [3.12.13 Covering of Solidification and Drop Boxes](#)
- [3.12.12 Nightly Closing Inspection](#)
- [3.12.12 Attachment 1 - Closing Inspection Checklist](#)
- [3.12.14 Preparation of Certificates of Disposal for Emerald Customers](#)
- [3.12.15 Subpart A \(Metal-Bearing\) Wastewater Processing and Discharge](#)
- [3.12.16 Management of Wastewater Which Fails Treatment](#)
- [3.12.17 Sludge Processing](#)
- [3.12.18 Tree Watering and Maintenance Procedure](#)

3.13: Facility Operations, Utah

- [3.13.2 Policy for Off-Loading Transferring Bulk Product](#)
- [3.13.3 Utah Truck Washing Procedure](#)
- [3.13.4 Policy for Off-Loading Bulk Product to Transport Hauler](#)
- [3.13.5 Utah Stormwater Monitoring Plan](#)
- [3.13.6 Used Oil Management](#)
- [3.13.7 Transferring Bulk Material From Truck To Railcar](#)

3.14 Facility Operations, Webster St.

- [3.14.1 Stormwater Monitoring Plan](#)
- [3.14.2 Sanitary Dump Station Discharge](#)
- [3.14.3 Truck Wash Requirements](#)
- [3.14.5 Bulk Transfer Procedure for the Webster Yard](#)
- [3.14.5 Attachment 1](#)
- [3.14.6 Sanitary Dump Station Sampling Requirements](#)
- [3.14.7 Webster St. Stormwater Maintenance Program](#)
- [3.14.7 Attachment 1 Stormwater Maintenance Checklist](#)
- [3.14.7 Attachment 2 StormFilter Inspection Report](#)
- [3.14.7 Attachment 3 StormFilter Maintenance Report](#)
- [3.14.7 Attachment 4 Quarterly Catch Basin Inspection Report](#)
- [3.14.8 Webster Warehouse Nightly Closing Inspection](#)
- [3.14.8 Attachment 1 - Webster Nightly Closing Inspection Checklist](#)
- [3.14.9 Webster Gate Valve Operation](#)

3.15: Facility Operations, Helena, MT

- [3.15.1 DIY Oil & Antifreeze Drop Off's at the Helena Facility](#)
- [3.15.1 Attachment 1 - DIY Drop Off List](#)
- [3.15.2 Nightly Closing Inspection](#)
- [3.15.2 Attachment 1](#)
- [3.15.4 Loading, Off-Loading, and-or Transferring Bulk Material](#)
- [3.15.5 Equipment Maintenance Program](#)
- [3.15.5 Attachment 1 - Monthly Inspection Checklist](#)
- [3.15.5 Attachment 1 - Weekly Inspection Checklist](#)
- [3.15.5 Attachment 2](#)

3.16: Facility Operations, Missoula, MT

- [3.16.1 DIY Oil & Antifreeze Drop Off's at the Missoula Facility](#)
- [3.16.1 Attachment 1 - DIY Drop Off List](#)
- [3.16.2 Nightly Closing Inspection](#)
- [3.16.2 Attachment 1](#)

3.17: Facility Operations, Palmer, AK

- [3.17.1 Sludge Solidification](#)
- [3.17.2 Absorbent Material Receiving Procedure](#)
- [3.17.3 Oil Filter Receiving](#)
- [3.17.4 Empty Drum Management](#)
- [3.17.5 Soil Consolidation](#)
- [3.17.6 Off-Loading and Transferring Bulk Product.pdf](#)
- [3.17.7 Antifreeze Management](#)
- [3.17.8 Requirements for Emerald-Generated Waste](#)

3.18: Facility Operations, Tacoma

- [3.18.1 Railcar HazWaste Loading Policy](#)
- [3.18.2 Loading, Off-Loading, and-or Transferring of Oil or Bulk Product](#)
- [3.18.3 Tacoma Sludge Press Operation](#)
- [3.18.5 SIVA Operating Procedure](#)
- [3.18.6 LUWA Operating Procedure](#)
- [3.18.7 SIVA Processing Procedures](#)
- [3.18.8 Drum Crushing and Disposal](#)
- [3.18.9 Stormwater System Maintenance Program](#)
- [3.18.10 Protective Coating Maintenance Policy](#)
- [3.18.11 Routine Maintenance for Skid Vac](#)
- [3.18.12 Cleaning of Dangerous Waste Containment Sumps](#)
- [3.18.13 Tacoma Tank Level Monitoring](#)
- [3.18.14 Packaging and Shipping of 150 Solvent](#)
- [3.18.15 Tacoma Facility Closing Inspection](#)
- [3.18.16 Wastewater Treatment System GAC Replacement](#)
- [3.18.17 Wastewater Treatment System Routine Operation](#)
- [3.18.18 Wastewater Treatment System Non-Routine Operation](#)
- [3.18.19 Tacoma Stormwater Monitoring Plan](#)
- [3.18.20 Handling of Containers Outside of Secondary Containment](#)
- [3.18.21 Transfer of Bulk Regulated Waste from Truck to Tank](#)
- [3.18.22 Tacoma Lab QA & QC Procedures](#)
- [3.18.23 Tacoma Facility Security](#)
- [3.18.24 Drum Hold Procedure](#)
- [3.18.24 Attachment 1 - Hold Area Storage Information](#)
- [3.18.25 Railcar Transferring of Heavy Heated Oil](#)
- [3.18.26 Tacoma Facility Paperwork Flow](#)

3.19: Facility Operations, Pasco

- [3.19.1 Pasco Facility Nightly Closing Inspection](#)
- [3.19.1 Attachment 1 - Pasco Facility Nightly Closing Inspection Checklist](#)

4: Checking and Corrective Action

- [4.1 Monitoring and Measurement](#)
- [4.2 Nonconformance and Corrective Action](#)
- [4.3 Records](#)

5: Management Review

- [5.1 Top Management Requirement](#)
- [5.2 Review EMS to Assess Suitability, Adequacy, and Effectiveness](#)
- [5.3 Document Review](#)
- [5.4 Changes in Policy and Direction](#)

Updated as of 3/2009
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III

4

Emerald Services, Inc. - Environmental and Hazardous Waste Services Division

Ordered: 5/14/2009

Requested Pick Up By: 5/21/2009

Order: 122484

INTERNAL DOCUMENT

Customer:	P.O. No.:	Generator / Site:	EPA ID
Customer #		Generator #	State ID
Billing Company		Generator Name	
Address		Address	
City ST Zip		City ST Zip	
Contact		Contact	
Phone, Fax		Phone, Fax	
Sales Person			

Order Lines:

Item	Description	Profile	Price	Quantity	Unit	Status	Haz.	TSDf	Reference Doc.
VERM	VERMICULITE (4 CU. FT.)				E				
SUR-Q-4	FUEL SURCHARGE			1.00	E				
DLF-Q-1	PCB BALLAST OSD 4/20/09	16965		1.00	DM55	Approved		48	

Internal Instructions:

Instructions for Drivers:

PU 1-55G PCB BALLASTS OSD 4/20/09

BRING Vermiculite - Fill DM to >90% Full, if needed

Fill in WT on attached PCB sheet; have customer sign

Emerald Service, Inc. Environmental and Hazardous Waste Services Division

Ordered: 5/14/2009

Requested Pick Up By: 5/21/2009

Order: 122484

7343 E. Marginal Way South, Seattle, WA 98108 Tel: (206) 363 - 9000

Customer:	P.O. No.:	Generator / Site:	EPA ID
Customer #		Generator #	State ID
Billing Company		Generator Name	
Address		Address	
City ST Zip		City ST Zip	
Contact		Contact	
Phone, Fax		Phone, Fax	
Sales Person			

Order Lines:

Item	Description	Profile	Quantity	Unit	Reference Document
DLF-Q-1	PCB BALLAST OSD 4/20/09	16965	1.00	DM55	
VERM	VERMICULITE (4 CU. FT.)				
SUR-Q-4	FUEL SURCHARGE		1.00	E	

Instructions for Drivers:

PU 1-55G PCB BALLASTS OSD 4/20/09

BRING VERMICULITE - FILL DM TO >90% FULL, IF NEEDED

FILL IN WT ON ATTACHED PCB SHEET; HAVE CUSTOMER SIGN

The undersigned hereby acknowledges receipt of the materials and/or commencement of services described above on behalf of the parties indicated as "GENERATOR/SITE". On behalf of Generator, I hereby make an appoint Envirotech Systems Generator's true and lawful agent for the purpose of managing and above waste responsibilities. I understand that this does not relieve Generator of its responsibilities as a generator even though title of the waste transfers to Envirotech Systems. Prices quoted herein are subject to waste inspection and acceptance at the destination waste management

BY: _____ DATE: _____

Emerald Service, Inc. Environmental and Hazardous Waste Services Division

Ordered: 5/14/2009

Requested Pick Up By: 5/21/2009

Order: 122484

7343 E. Marginal Way South, Seattle, WA 98108 Tel: (206) 363 - 9000

Customer:	P.O. No.:	Generator / Site:	EPA ID
Customer #		Generator #	State ID
Billing Company		Generator Name	
Address		Address	
City ST Zip		City ST Zip	
Contact		Contact	
Phone, Fax		Phone, Fax	
Sales Person			

Order Lines:

Item	Description	Profile	Quantity	Unit	Reference Document
DLF-Q-1	PCB BALLAST OSD 4/20/09	16965	1.00	DM55	
VERM	VERMICULITE (4 CU. FT.)				
SUR-Q-4	FUEL SURCHARGE		1.00	E	

Instructions for Drivers:

PU 1-55G PCB BALLASTS OSD 4/20/09

BRING VERMICULITE - FILL DM TO >90% FULL, IF NEEDED

FILL IN WT ON ATTACHED PCB SHEET; HAVE CUSTOMER SIGN

The undersigned hereby acknowledges receipt of the materials and/or commencement of services described above on behalf of the parties indicated as "GENERATOR/SITE". On behalf of Generator, I hereby make an appoint Envirotech Systems Generator's true and lawful agent for the purpose of managing and above waste responsibilities. I understand that this does not relieve Generator of its responsibilities as a generator even though title of the waste transfers to Envirotech Systems. Prices quoted herein are subject to waste inspection and acceptance at the destination waste management

BY: _____ DATE: _____

an American Ecology company

Site: 10.5 Miles NW on Hwy 78, Lemley Rd.
Office: PO Box 400, Grand View, ID 83624

Manifest #: _____

For USEI Use-Only

Load #: _____

Received: _____

Explanation:

- Explanation (Continued)**

- Instructions:**

Certification: In order to induce USEI to accept the waste material specified at the USEI-Grand View, Idaho facility the undersigned as an authorized employee of the generating company hereby warrants and certifies to USEI that the waste material listed above, delivered to and accepted for disposal by USEI shall conform to the above description and that all waste material and packaging shall comply with all current state and federal regulations.

Signature: _____ Title: _____ Date: _____

Note: A completed PCB Control Sheet, including generator's signature, must accompany each shipment of regulated PCB waste.



Generator's Hazardous Waste Profile Sheet

Service Agreement on file? ☐ Yes ☐ No Profile Number OR300948

☐ Check here if there are multiple generating locations for this waste. Attach additional locations

☒ Check here if a Certificate of Destruction or Disposal is required

Requested Disposal Facility Chemical Waste Management

☐ Renewal for Profile Number _____ Waste Approval Expiration Date _____

A. Waste Generator Facility Information (must reflect location of waste generation/origin)

1 Generator Name: _____ 7 Email Address: _____
 2 Site Address: _____ 8 Phone: _____
 3 City/ZIP: Seattle, 98144 9 FAX: _____
 4 State: WA 10 NAICS Code: 236220
 5 County: King 11 Generator USEPA ID #: 40 CFR 761
 6 Contact Name/Title: _____ 12 State ID# (if applicable): _____

B. Customer Information ☐ same as above

P. O. Number: _____

1 Customer Name: Emerald Svcs/Envmtl & Haz Waste Svcs 6 Phone: _____ FAX: _____
 2 Billing Address: 7343 East Marginal Way South 7 Transporter Name: Envirotech Systems
 3 City, State and ZIP: Seattle, WA, 98108 8 Transporter ID # (if appl.): _____
 4 Contact Name: _____ 9 Transporter Address: 7343 E. Marginal Way S
 5 Contact Email: _____ 10 City, State and ZIP: Seattle, WA, 98108

C. Waste Stream Information

☐ USEPA Hazardous

☐ State Hazardous

☒ TSCA

1 Description

a Name of Waste: PCB Ballasts

b Process Generating Waste:

Change out

c Color: black

d Strong Odor (describe): NA

e Physical State at 70°F: ☒ Solid ☐ Liquid ☐ Gas ☐ Sludge ☐ Other: _____

f Layers? ☒ Single layer ☐ Multi-layer

g Free Liquid Range (%) 0 to 0 Specific Gravity: _____ Viscosity: NA BTU/lb: NA

h pH Range: NA to NA

i Liquid Flash Point: ☐ < 73°F ☐ 73°-99°F ☐ 100°-139°F ☐ 140°-199°F ☐ > 200°F ☒ N/A

2 Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to question f

☐ Yes ☒ No

a If yes, identify ALL USEPA listed and characteristic waste code numbers (D,F,K,P,U)

b If a characteristic hazardous waste, do underlying hazardous constituents(UHCs) apply-(40 CFR 268.48)? ☐ Yes ☐ No (if yes, list in Section C.2 j)

c Is the waste subject to RCRA Subpart CC Controls-(40 CFR 264.1083 & 265.1084)? ☐ Yes ☒ No ☐ ? Click for Add'l Info

If no, does the waste meet the organic LDR Exemption?

☒ Yes ☐ No

If no, does the waste contain <500 ppm volatile organic (VOC's)?

☐ Yes ☐ No

Volatile organic concentration _____ ppm

d Is the waste predominately debris subject to the Alternate Debris Standards (40 CFR 268.45)?

☐ Yes ☒ No

e Is the waste predominately soil subject to the Alternate Soil Treatment Standards-(40 CFR 268.49)?

☐ Yes ☒ No

If yes, will Underlying Hazardous Constituents apply? (list in C.2 j)

☐ Yes ☐ No

f Does the waste represented by this profile contain asbestos?

☐ Yes ☒ No

If yes, ☐ Friable ☐ Non-Friable

g Does the waste represented by this profile contain benzene?

☐ Yes ☒ No

Is this subject to Benzene Operations Waste NESHAP (40 CFR Part 61 Subpart FF)?

☐ Yes ☐ No

If yes, complete Benzene Waste Operations NESHAP (BWON) questionnaire



Generator's Hazardous Waste Profile Sheet

Profile Number OR300948

C. Waste Stream Information (continued)

- h. Is this profile for remediation waste from a facility that is a major source of Hazardous Air Pollutants (Site Remediation NESHAP, 40 CFR 63 subpart GGGGG)? ☐ Yes ☒ No
If yes, does the waste contain <500 ppm VOHAPs at the point of determination? ☐ Yes ☐ No
- i. Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (if yes, list in Chemical Composition - C.2.j) ☒ Yes ☐ No
Were the PCBs imported into the U.S.? ☐ Yes ☒ No
Are PCBs regulated under the "Self-Implementing Remediation Section of (Mega) Rule?" 40CFR 761.61(a) ☐ Yes ☒ No
- j. Chemical Composition (List all constituents [including halogenated organics, debris, and UHC's] present in any concentration and submit representative analysis): ☐ (See Attached -- for entering additional constituents)

Constituents (Total Composition Must be > 100%)	Lower Range	Unit of Measure	Upper Range	Unit of Measure
1. PCB Ballasts	100	%	100	%
2. Out of Service 12-03-08				
3.				
4.				
5.				
6.				

- k. Check any that apply: ☐ Pyrophoric ☐ Water Reactive ☐ OSHA Carcinogen ☐ Shock Sensitive ☐ Oxidizer ☐ Infectious
- l. Is the waste subject to controls as a Group 1 wastewater or residual under the Hazardous Organic NESHAP? ☐ Yes ☒ No
If yes, is it a Table 8 _____ or Table 9 _____ compound?
- m. Does the waste represented by this waste profile sheet contain radioactive material? ☐ Yes ☒ No
Is disposal regulated by the Nuclear Regulatory Commission? ☐ Yes ☐ No
If NORM, identify isotopes and concentration, _____ pCi/g
- n. Is the waste from a CERCLA (40 CFR 300, Appendix B) or state mandated clean-up? ☐ Yes ☒ No
If yes, attach Record of Decision (ROD). 104/106 or 122 order or court order that governs site clean-up for activity
For state mandated clean-up, provide relevant documentation.
- o. Is this a State Hazardous Waste? ☒ Yes ☐ No If yes, please list applicable codes X002
If NY waste codes B001-B007 apply, please complete question C.2.c on page 1.

D. DOT Information and Shipping Volume

1. Quantity of Waste
a. ☐ One Time Event ☐ Base ☒ Repeat Event
b. Estimated Annual Quantity: 1 ☐ Tons ☐ Yards ☒ Drums ☐ Other (specify) _____
c. Shipping Frequency: Units: 1 Per: ☐ Month ☐ Quarter ☒ Year ☐ One Time ☐ Other _____
2. Shipping Information
a. Packaging:
☐ Roll off/End dump: _____ ☐ Other: _____
☒ Drum Type/Size: 1H2 - 5 gallons ☐ Vacuum Box
☐ Tanker ☐ Super Sack ☐ Tote Bin ☐ Cubic Yard Boxes
b. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip c, d and e) ☒ Yes ☐ No
c. Reportable Quantity (lbs ; kgs.): 1 d. Primary/Subsidiary Hazard Class(es)/ID#: 9/UN3432
e. USDOT Shipping Name: RQ, Polychlorinated Biphenyls, Solid PG: II

E. Generator Certification (Please read and certify by signature below)

I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this wastestream. Any sample submitted is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile. All relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste will be disclosed to the contractor. All changes which occur in the character of the waste will be identified by the Generator and be disclosed to the Contractor prior to providing the waste to the Contractor.

Certification Signature: 2

Name (Type or Print): _____

Title: shop manager

Company Name: _____

Date: 4/7/09

☒ Check if additional information is attached. Indicate the number of attached pages 1

PCB CONTINUATION SHEET

GENERATOR NAME	MANIFEST NUMBER	PAGE 1 OF 1
----------------	-----------------	----------------

This continuation sheet contains the information required under 40 CFR 761.207

THE MANIFEST – GENERAL REQUIREMENTS

[illegible]

CERTIFICATION: I certify the information listed above accurately describes all of the PCB Waste contained on this manifest.

SIGNATURE

TITLE

Chemist

DATE _____

Jan. 6, 2009

IF MORE SPACE IS NEEDED - PLEASE USE ANOTHER CONTINUATION SHEET



Generator's Hazardous Waste Profile Sheet

Service Agreement on file? ☐ Yes ☐ No Profile Number OR300948

☐ Check here if there are multiple generating locations for this waste. Attach additional locations.

☒ Check here if a Certificate of Destruction or Disposal is required

Requested Disposal Facility Chemical Waste Management

☐ Renewal for Profile Number _____ Waste Approval Expiration Date _____

A. Waste Generator Facility Information (must reflect location of waste generation/origin)

- | | |
|------------------------------------|---|
| 1. Generator Name: _____ | 7. Email Address: _____ |
| 2. Site Address: _____ | 8. Phone: _____ |
| 3. City/ZIP: <u>Seattle, 98144</u> | 9. FAX: _____ |
| 4. State: <u>WA</u> | 10. NAICS Code: <u>236220</u> |
| 5. County: <u>King</u> | 11. Generator USEPA ID #: <u>40 CFR 761</u> |
| 6. Contact Name/Title: _____ | 12. State ID# (if applicable): _____ |

B. Customer Information ☐ same as above

P. O. Number: _____

- | | |
|---|---|
| 1. Customer Name: <u>Emerald Svcs/Envmtl & Haz Waste Svcs</u> | 6. Phone: _____ FAX: _____ |
| 2. Billing Address: <u>7343 East Marginal Way South</u> | 7. Transporter Name: <u>Envirotech Systems</u> |
| 3. City, State and ZIP: <u>Seattle, WA, 98108</u> | 8. Transporter ID # (if appl): _____ |
| 4. Contact Name: _____ | 9. Transporter Address: <u>7343 E. Marginal Way S</u> |
| 5. Contact Email: _____ | 10. City, State and ZIP: <u>Seattle, WA, 98108</u> |

C. Waste Stream Information

☐ USEPA Hazardous

☐ State Hazardous

☒ TSCA

1. Description

a. Name of Waste: PCB Ballasts

b. Process Generating Waste:

Change out

c. Color: black

d. Strong Odor (describe): NA

e. Physical State at 70°F: ☒ Solid ☐ Liquid ☐ Gas ☐ Sludge ☐ Other: _____

f. Layers? ☒ Single layer ☐ Multi-layer

g. Free Liquid Range (%) 0 to 0 Specific Gravity: _____ Viscosity: NA BTU/lb: NA

h. pH Range: NA to NA

i. Liquid Flash Point: ☐ < 73°F ☐ 73°-99°F ☐ 100°-139°F ☐ 140°-199°F ☐ > 200°F ☒ N/A

2. Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to question f

☐ Yes ☒ No

a. If yes, identify ALL USEPA listed and characteristic waste code numbers (D,F,K,P,U)

b. If a characteristic hazardous waste, do underlying hazardous constituents(UHCs) apply-(40 CFR 268.48)? ☐ Yes ☐ No
(if yes, list in Section C.2 j)

c. Is the waste subject to RCRA Subpart CC Controls-(40 CFR 264.1083 & 265.1084)? ☐ Yes ☒ No ☐ ? Click for Add'l Info

If no, does the waste meet the organic LDR Exemption?

☒ Yes ☐ No

If no, does the waste contain <500 ppm volatile organic (VOC's)?

☐ Yes ☐ No

Volatile organic concentration _____ ppm

d. Is the waste predominately debris subject to the Alternate Debris Standards (40 CFR 268.45)?

☐ Yes ☒ No

e. Is the waste predominately soil subject to the Alternate Soil Treatment Standards-(40 CFR 268.49)?

☐ Yes ☒ No

If yes, will Underlying Hazardous Constituents apply? (list in C.2 j)

☐ Yes ☐ No

f. Does the waste represented by this profile contain asbestos?

☐ Yes ☒ No

If yes, ☐ Friable ☐ Non-Friable

g. Does the waste represented by this profile contain benzene?

☐ Yes ☒ No

Is this subject to Benzene Operations Waste NESHAP (40 CFR Part 61 Subpart FF)?

☐ Yes ☐ No

If yes, complete Benzene Waste Operations NESHAP (BWON) questionnaire



Generator's Hazardous Waste Profile Sheet

Profile Number OR300948

C. Waste Stream Information (continued)

- h. Is this profile for remediation waste from a facility that is a major source of Hazardous Air Pollutants (Site Remediation NESHAP, 40 CFR 63 subpart GGGGG)? ☐ Yes ☒ No
If yes, does the waste contain <500 ppm VOHAPs at the point of determination? ☐ Yes ☐ No
- i. Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (if yes, list in Chemical Composition - C.2.j) ☒ Yes ☐ No
Were the PCBs imported into the U.S.? ☐ Yes ☒ No
Are PCBs regulated under the "Self-Implementing Remediation Section of (Mega) Rule?" 40CFR 761.61(a) ☐ Yes ☒ No
- j. Chemical Composition (List all constituents [including halogenated organics, debris, and UHC's] present in any concentration and submit representative analysis): ☐ (See Attached - for entering additional constituents)

Constituents (Total Composition Must be > 100%)	Lower Range	Unit of Measure	Upper Range	Unit of Measure
1. PCB Ballasts	100	%	100	%
2. Out of Service 12-03-08				
3.				
4.				
5.				
6.				

- k. Check any that apply: ☐ Pyrophoric ☐ Water Reactive ☐ OSHA Carcinogen ☐ Shock Sensitive ☐ Oxidizer ☐ Infectious
- l. Is the waste subject to controls as a Group 1 wastewater or residual under the Hazardous Organic NESHAP? ☐ Yes ☒ No
If yes, is it a Table 8 _____ or Table 9 _____ compound?
- m. Does the waste represented by this waste profile sheet contain radioactive material? ☐ Yes ☒ No
Is disposal regulated by the Nuclear Regulatory Commission? ☐ Yes ☐ No
If NORM, identify isotopes and concentration, _____ pCi/g
- n. Is the waste from a CERCLA (40 CFR 300, Appendix B) or state mandated clean-up? ☐ Yes ☒ No
If yes, attach Record of Decision (ROD), 104/106 or 122 order or court order that governs site clean-up for activity.
For state mandated clean-up; provide relevant documentation.
- o. Is this a State Hazardous Waste? ☒ Yes ☐ No If yes, please list applicable codes X002
If NY waste codes B001-B007 apply, please complete question C.2.c on page 1.

D. DOT Information and Shipping Volume

1. Quantity of Waste
a. ☐ One Time Event ☐ Base ☒ Repeat Event
b. Estimated Annual Quantity: 1 ☐ Tons ☐ Yards ☒ Drums ☐ Other (specify) _____
c. Shipping Frequency: Units: 1 Per: ☐ Month ☐ Quarter ☒ Year ☐ One Time ☐ Other _____
2. Shipping Information
a. Packaging:
☐ Roll off/End dump: _____ ☐ Other: _____
☒ Drum Type/Size: 1H2 - 5 gallons ☐ Vacuum Box
☐ Tanker ☐ Super Sack ☐ Tote Bin ☐ Cubic Yard Boxes
- b. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip c, d and e) ☒ Yes ☐ No
- c. Reportable Quantity (lbs.; kgs.): 1 d. Primary/Subsidiary Hazard Class(es)/ID#: 9/UN3432
- e. USDOT Shipping Name: RQ, Polychlorinated Biphenyls, Solid PG: II

E. Generator Certification (Please read and certify by signature below)

I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this wastestream. Any sample submitted is representative as defined in 40 CFR 261 - Appendix 1 or by using an equivalent method. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile. All relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste will be disclosed to the contractor. All changes which occur in the character of the waste will be identified by the Generator and be disclosed to the Contractor prior to providing the waste to the Contractor

Certification Signature: _____ Title: _____
Name (Type or Print): _____ Company Name: _____ Date: _____

☒ Check if additional information is attached. Indicate the number of attached pages 1



American Ecology Corporation

GENERATOR PCB WASTE PRODUCT QUESTIONNAIRE

☐ US Ecology Idaho, Inc.

P.O. Box 400

10.5 Miles NW on Hwy 78, Lemley Rd

Grand View, Idaho 83624

(800) 274-1516, (208) 834-2275

Fax: (208) 834-2919

EPA ID#: IDD073114654

☐ US Ecology (Beatty, NV)

P.O. Box 578

Highway 95, 11 miles South of Beatty

Beatty, NV 89003

(800) 239-3943, (775) 553-2203

Fax: (775) 553-2125

EPA ID#: NVT330010000

SECTION A—GENERATOR INFORMATION

1 a. Generator _____

Mailing Address _____ City/State _____ ZIP _____

Shipping Address _____ City/State _____ ZIP _____

1.b. Tech./Off-Spec. Contact _____ TEL _____ FAX _____

(WHEN TRUCK ARRIVES AT FACILITY)

24 HR. 7 Day/Week Contact _____ TEL _____ FAX _____

Email _____

U.S. EPA IDENTIFICATION NUMBER

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

STATE IDENTIFICATION NUMBER (if applicable)

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

2. Billing/Broker _____

Address _____ City/State _____ ZIP _____

Billing Contact _____ TEL _____ FAX _____

Email _____

SECTION B—WASTE CHARACTERIZATION

GRAND VIEW, ID

PCB Solids <input type="checkbox"/> Dirt - Soil <input type="checkbox"/> Debris (PPE, Rags, Etc.) <input type="checkbox"/> Mixed soil/debris	<input type="checkbox"/> Non-Liquid dredged materials and municipal sewage treatment sludge containing PCB
Transformer <input type="checkbox"/> 50-500 PPM <input type="checkbox"/> Above 500 PPM <input type="checkbox"/> Full <input type="checkbox"/> Drained <input type="checkbox"/> Drained and Flushed	Transformer less than or equal to 50 PPM <input type="checkbox"/> Full <input type="checkbox"/> Drained
PCB Liquids <input type="checkbox"/> Below 50 PPM <input type="checkbox"/> Above 50 PPM <input type="checkbox"/> Landfill <input type="checkbox"/> Incinerate	<input type="checkbox"/> PCB spill clean up material from a source greater than 50 PPM
<input type="checkbox"/> Capacitors - Large (over 3 lbs of Liquid or 100 cu. in.) All Large Capacitors Are Incinerated	Capacitors - Small (Less than 3 lbs of Liquid or 100 cu. in.) includes ballast <input type="checkbox"/> Incineration <input type="checkbox"/> Landfill
PCB hydraulic machine <input type="checkbox"/> Full <input type="checkbox"/> Drained of all free flowing liquids	<input type="checkbox"/> Articles (regulators, switches, conductors) drained of all free liquid
Articles - Liquids Below 50 PPM <input type="checkbox"/> Drain <input type="checkbox"/> Landfill	Articles - Liquids <input type="checkbox"/> 50-500 PPM <input type="checkbox"/> Above 500 PPM <input type="checkbox"/> Full <input type="checkbox"/> Drained <input type="checkbox"/> Drained and Flushed

BEATTY, NV

Note: Using Beatty's attached Waste/Services Description please select appropriate category (not required for Grand View Customers)

Transformers/Articles Categories: <input type="checkbox"/> C <input type="checkbox"/> C-1 <input type="checkbox"/> C-2 <input type="checkbox"/> D <input type="checkbox"/> D-1 <input type="checkbox"/> G <input type="checkbox"/> J <input type="checkbox"/> J-1 <input type="checkbox"/> M-1	Bulk Clean Up Material Categories: <input type="checkbox"/> A-1 <input type="checkbox"/> A-2 <input type="checkbox"/> M
Drummed Containerized Materials Categories: <input type="checkbox"/> A-1 <input type="checkbox"/> A-2 <input type="checkbox"/> F <input type="checkbox"/> M <input type="checkbox"/> M-1	Other Materials Categories: <input type="checkbox"/> E <input type="checkbox"/> I <input type="checkbox"/> X <input type="checkbox"/> K <input type="checkbox"/> Z <input type="checkbox"/> Z/K <input type="checkbox"/> Z/L
<input type="checkbox"/> Check to indicate all categories may be shipped.	

SECTION C—PHYSICAL PROPERTIES & GENERAL INFORMATION (Not applicable to Beatty)

1. Process generating this waste _____
2. Does this material contain radioactive, pyrophoric, shock sensitive, or explosive materials? ☐ Yes ☐ No
3. Are any of the materials RCRA regulated? ☐ Yes ☐ No Note: If yes, please submit a RCRA WPQ.
4. Flash Point: 1. ☐ <100 °F 2. ☐ 101-140 °F 3. ☐ 141-200 °F 4. ☐ >200 °F Comments: _____
5. Does this waste pass the EPA specified Paint Filter Test? ☐ Yes ☐ No Comments: _____
6. Has material been solidified/stabilized: ☐ Yes ☐ No If yes list additives: _____

SECTION D—SHIPPING AND HANDLING INFORMATION

PCB MATERIALS MUST BE PACKAGED AND SHIPPED IN ACCORDANCE WITH D.O.T. REGULATIONS AS SPECIFIED IN 49 CFR 100-177, AND ALSO PACKAGED IN ACCORDANCE WITH EPA REGULATIONS AS SPECIFIED IN 40 CFR PART 761.

1. D.O.T. Hazardous Material? ☐ Yes ☐ No
2. D.O.T. RQ Required: ☐ Yes ☐ No ☐ N/A
3. Proper D.O.T. Shipping Name: _____
4. D.O.T. Hazard Class: _____
5. D.O.T. ID Number: _____
6. D.O.T. Packing Group: _____
7. Additional D.O.T. Description(s): _____
8. Type of Container: ☐ Drum ☐ Bulk Truck
Other (specify): _____
9. Projected Volume: _____ Tons _____ Gallons _____ Cubic _____ Yards _____ Drum(s) _____ Other _____
Per: ☐ One Time ☐ Week ☐ Month ☐ Quarter ☐ Year
10. Comments/Special Handling: _____

SECTION E—GENERATOR CERTIFICATION

CERTIFICATION OF LIQUIDS TREATMENT (for all non-liquid bulk wastes)

1. **If greater than 50 ppm PCB—a PCB Control Sheet is required.** (A PCB control sheet must accompany TSCA regulated waste)
2. Solids for Direct Burial.
☐ generated as a solid material containing no free liquids

☐ generated as a bulk liquid or hazardous waste containing free liquids which has been treated to eliminate free liquids in compliance with Section 3004 (c) of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984, and the treatment process utilized did not employ the addition of absorbents to the waste (unless used in a stabilization process), and the materials used in the treatment process do not biodegrade or release liquids when compressed.

I hereby certify that as an authorized representative of the generator named above, all information submitted in this and all the attached documents is true and accurate. To the best of my knowledge, all known and suspected hazardous components have been included in this document. All material and packaging will comply with all current regulations and any material profiled under B.9 and being shipped for direct landfill has been determined to be legal for placement in a TSCA permitted landfill.

Signature: _____ Title: _____ Date: _____

Name: _____
(Please Type or Print)

US ECOLOGY USE ONLY

Initial Review: _____ Technical Review: _____ Final Review: _____

Date Approved: _____ Date Denied: _____ Compatibility: _____

Treatment/Disposal Routing: _____

WASTE/SERVICES DESCRIPTION

The following PCB categories indicate the type of waste and services to be performed by US Ecology and final disposal for a particular type of waste (i.e., landfilling on site, or transfer to a permitted treatment/incineration facility). Should you have any difficulty determining which of the below categories accurately describes your PCB wastes, please feel free to call 1-800-239-3943.

CATEGORIES

- A. (1) Any non-liquid PCB, non-reportable spill material in the form of soil, rags, or other debris. Please give a detailed description of debris (i.e. tools, tree branches, rags, or soil).
- A. (2) Any non-liquid PCB, reportable spill material in the form of soil, rags, or other debris. Please give a detailed description of debris (i.e. tools, tree branches, rags, or soil).
- B. Non-liquid dredged materials and municipal sewage treatment sludges that contain PCBs.
- C. PCB transformers (≥ 500 ppm) which have been drained of all free-flowing liquids, filled with a PCB soluble solvent, allowed to stand for at least 18 hours, then drained thoroughly.
- C. (1) PCB transformers (≥ 500 ppm) accepted at US Ecology, which require the draining of all free flowing liquids and the flushing with a PCB soluble solvent in accordance with all, permit requirements and applicable regulations prior to disposal. PCB liquids removed from the transformers shall be disposed of in accordance with Section 761.60.
- C. (2) PCB transformers (≥ 500 ppm) accepted at US Ecology which have been drained of all free flowing liquids, but require flushing with a PCB soluble solvent in accordance with all permit requirements and applicable regulations prior to disposal. PCB liquids removed from the transformers shall be disposed of in accordance with Section 761.60.
- D. PCB-contaminated transformers (< 500 ppm) which have been drained of all free-flowing liquids.
- D. (1) PCB-contaminated transformers (< 500 ppm) accepted at US Ecology which require the draining of all free flowing liquids. PCB liquids removed from the transformers shall be disposed of in accordance with Section 761.60.
- E. Capacitors which have been determined not to contain PCBs as indicated by label or nameplate information, manufacturer's literature, or chemical analysis and have been packaged in containers with sufficient absorbent added.
- F. PCB small capacitors (as defined in 40 CFR 761.3) not owned by any person who manufactures or at any time manufactured PCB capacitors or PCB equipment and acquired the PCB capacitors in the course of such manufacturing and have been packaged in containers with sufficient absorbent added.
- G. Compound transformers and bushings that do not require draining and/or flushing.
- I. PCB hydraulic machines which have been drained of all free-flowing liquids. If the PCB liquid contains 1000 ppm PCBs, then the hydraulic machine must be flushed with PCB soluble solvent prior to acceptance by US Ecology.
- J. Articles (regulators, switches, conductors) drained of all free liquid.
- J. (1) Articles accepted at US Ecology which require draining. PCB liquids removed from the articles shall be disposed of in accordance with Section 761.60
- K. Empty PCB containers.
- M. Any non-liquid, non-regulated PCB spill material (< 50 ppm) from a known source less than 50 ppm PCB. Please give a detailed description of the material (i.e., tools, rags, or soil).
- M.(1) PCB oils & water > 2 ppm, < 50 ppm.
- X. Large PCB capacitors (as defined in 40 CFR 761.3) – require incineration.
- Z. Non-RCRA PCB bulk liquids – require incineration.
- Z/K. Drums which contain non-RCRA PCB liquid > 500 ppm – require incineration.
- Z/L. Drums which contain non-RCRA PCB liquid < 500 ppm – require incineration.

Site: 10.5 Miles NW on Hwy 78, Lemley Rd.
Office: PO Box 400, Grand View, ID 83624

Page: _____ of _____

For USEI Use-Only

Received: _____

[illegible]

8. **KVA:** Enter the nameplate KVA rating of the transformer or article.

- 13. Spill:** Enter yes or no to designate if the material is or is not a result of a spill.

Additional section to be filled out for PCB drum materials: 7.

Signature: _____ Title: _____ Date: _____

PRINT FORM

SUBMIT FORM

IV

**PHOTOGRAPHY LOG
EMERALD SERVICES MARGINAL WAY FACILITY
SEATTLE, WASHINGTON**

Photographs 1 – Temporary PCB Storage Area – no PCBs present at time of inspection

Photograph 2 – Spill Kit

All photographs taken by Eileen Hileman on May 14, 2009, at Emerald Services Marginal Way Facility, Seattle, Washington.

